

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III 841 Chestnut Building Philadelphia; Pennsylvania 19107

CERTIFIED MAIL RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW11:

Allied Steel Products Corp. 123 N. 8th Street Kenilworth, NJ 07033 Attn: John Van Dzura

NOV 0 & 1930

Re: Recticon/Allied Steel Site

Parkerford, PA

Dear Mr. Van Dzura:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of a release, of hazardous substances, pollutants or contaminants into the environment at the above referenced site. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act, as amended ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), your company is required to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its employees or agents which concern, refer, or relate to the questions outlined below.

The provisions in Section 104 of CERCLA, 42 U.S.C. Section 9604 and Section 3008 of RCRA, 42 U.S.C. Section 6928, authorize EPA to pursue penalties for failure to comply with these sections or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may lead to the imposition of criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

Instructions for responding to this required submission of information are provided below.

- b. Address
- · c. Credit limit
 - d. Amount owed
 - e. Credit Available
 - f. Monthly Payments.
- 8. Location, box number, and contents of all safe deposit boxes rented or accessed.
- 9. A description of and statement of type of ownership, including the County and State, of any real property owned by Allied Steel Products Corporation.
- 10. A list of life insurance policies owned with Allied Steel Products Corp. as beneficiary.
 - a. Names of insured
 - b. Company
 - c. Policy number
 - d. Type
 - e. Face amount
 - f. Available loan value
- 11. Additional information regarding financial condition.
- a. The docket numbers and names of any court proceedings the Allied Steel Products Corporation or any of its subsidiaries is currently involved in.
- b. The docket number, dates, and chapter of any bankruptcies filed by the Allied Steel Products Corporation or any of its subsidiaries.
- c. Were any assets transferred, at less than full value, by Allied Steel Products Corporation in the past five years?
- d. Does Allied Steel Products Corporation participate in any trusts, estates, profit-sharing plans, etc.?
- 12. Accounts/Notes Receivable of Allied Steel Products Corporation including loans to stockholders, officers, partners, etc.
 - a. Name
 - b. Address
 - c. Amount due
 - d. Date due
 - e. Status
- 13. An analysis of Allied Steel Products Corporation's current assets and liabilities to include:
 - a. Current Cash on hand
 - b. Current bank account amounts

Your answer to this information request should include copies of any and all documents maintained by you or in your custody, control or possession relating to the matters described below.

Within ten (10) business days of receipt of this letter, you are to address and answer the questions relevant to the Allied Steel Products Corporation's financial status and within thirty (30) business days of receipt of this letter you must substantiate all data provided. This substantiation includes, but is not limited to, copies of Tax returns and schedules (Forms 1120, 990, 990PF, 990AR.....etc.) for the past five years.

The following information is requested:

- 1. Business phone number
- 2. Type of business (e.g. manufacturing, charitable, etc.)
- 3. Type of entity (e.g. corporation, partnership, sole proprietorship, private foundation...etc.)
- 4. Information about owners, partners, officers, major shareholders, directors, etc.
 - a. Names and title
 - b. Effective date
 - c. Home address
 - d. Phone number
 - e. Social Security Number
 - f. Total Shares or Interest
 - 5. Latest filed income tax return
 - a. Form number (e.g. 1120, 990, 990PF, etc.)
 - b. Tax year ended
 - c. Net income before taxes
- 6. Bank accounts (Include all types of accounts such as payroll and general, savings, certificates of deposits, etc.)
 - a. Name of Institution
 - b. Address
 - c. Type of account
 - d. Account Number
 - e. Balance
 - 7. Bank Credit Available (line of Credit, etc.)
 - a. Name of institution

- c. The amounts of accounts/notes receivable (from paragraph 13) and a list and the amounts of stocks, bonds and other investments
 - d. Life insurance loan value (from paragraph 11)
 - e. Real Property (from paragraph 10)
 - 1. Current market value
 - 2. Balances due
 - 3. Equity
 - 4. Amount of monthly payment
 - Name and address of lien/note holder/obligee
 - 6. Date pledged
 - 7. Date of final payment
- f. Vehicles (models, year, tag numbers and the State of registration)
 - Current market value
 - 2. Balances due
 - 3. Equity
 - 4. Amount of monthly payment
 - 5. Name and address of lien/note holder/obligee
 - 6. Date pledged
 - 7. Date of final payment
- g. Machinery and equipment (specify type, model no. etc.)
 - 1. Current market value
 - 2. Balance due
 - 3. Equity
 - 4. Amount of monthly payment
 - Name and address of lien/note holder/obligee
 - h. Merchandise Inventory (specify)
 - 1. Current market value
 - 2. Balance due
 - 3. Equity
 - 4. Amount of monthly payment
 - Name and address of lien/note holder/obligee
 - Other assets (specify)
 - 1. Current market value
 - 2. Balance due

- 3. Equity
- 4. Amount of monthly payment
- 5. Name and address of lien/note holder/obligee
- 6. Description
- j. Liabilities (include notes and judgements)
 - 1. Current balance due
 - 2. Amount of monthly payment
 - 3. Name and address of lien/note holder/obligee
 - 4. Date pledged
 - 5. Date of final payment
- 14. Current Income (on a monthly basis)
 - a. Gross receipts from sales, services, etc.
 - b. Gross rental income
 - c. Interest
 - d. Dividends
 - e. Other income (specify)
- 15. Current Expenses (on a monthly basis)
 - a. Materials purchased
 - b. Net wages and salaries
 - c. Rent
 - d. Installment payments
 - e. Supplies
 - f. Utilities/telephone
 - g. Gasoline/oil/fuel/(vehicles)
 - h. repairs and maintenance
 - i. Insurance
 - j. Current taxes
 - k. Other (specify)
- 16. State the name, address, telephone number, date and state of incorporation (if applicable) and nature of business of any subsidiary or business related to or affiliated with Allied Steel Products Corp.
- 17. For each corporation, partnership, business or business entity identified in response to question 16, complete a separate copy of the form attached in Appendix B to this letter titled "Financial Statement of Corporate Debtor."

You are entitled to assert a claim of business confidentiality covering any part of all of the submitted information, in the manner described in 40 C.F.R. Section

2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you.

Please respond in writing to this required submission of information as previously specified.

All documents and information should be sent to:

Harry R. Steinmetz PRP Search Section (3HW11) U.S. Environmental Protection Agency, Region III 841 Chestnut Building, 6th Floor Philadelphia, PA 19107

If you have any questions concerning this matter, please contact Mr. Steinmetz at (215) 597-1192.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Sincerely,

Peter W. Schaul, Chief Superfund Program Branch

cc: Dave Byro (3HW21)
Sarah Keating (3RC32)